

1B Docket 11-109

From: myIBFS
Sent: Wednesday, August 10, 2011 10:31 AM
To: Jerry Ma; Gerald Mays; Sarita Kale; Siva Appavu; Andrea Kelly; Stephen Duall; Kathryn Medley; CurTrisha Banks; Stephanie Shieh; Kathleen Campbell
Subject: Pleadings and Comments Notification from MyIBFS

Type of Pleading: LETTER

Date filed: 08/10/2011

Filer Information:
Cassy Landewee
MFA Agri Services

Contact Information:

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Proceedings List

| File Number | Callsign | Applicant |
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| SATMOD2010111800239 | S2358 | LightSquared Subsidiary LLC |

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Precision Agronomy Systems

201 Ray Young Drive Columbia, MO 65201
Phone: (573) 876-5383 Fax: (573) 876-5590



August 5, 2011

Federal Communications Commission
Office of the Secretary
445 12th Street, SW, Room TW-A325
Washington, DC 20554

RE: IB Docket No. 11-109

To Whom It May Concern:

MFA Incorporated ("MFA"), a farmer owned farm supply and grain marketing cooperative with approximately 45,000 farmer-members, submits the following comments regarding the final report of the technical working group co-chaired by LightSquared Subsidiary LLC (LightSquared) and the United States Global Positioning System (GPS) Industry Council (USGIC).

High-speed broadband and Global Positioning System (GPS) technologies are important to MFA's member families, but the advancement of broadband should not be at the expense of GPS devices used by farmers, emergency responders, aviation, military and other civil engineers that use GPS. MFA's owners/customers have made substantial financial investments in GPS technologies and use GPS devices for field mapping, gathering production information and to more accurately apply fertilizer and crop protection products, among other uses.

MFA has over 700,000 acres in GPS sampled nutrient management, 9.5 million acres covered with RTK correction, and have sold almost \$20 million dollars of GPS equipment to farmers that will be directly affected by the implementation of GPS in agriculture. The technology has helped farmers improve their environmental stewardship while gaining economic efficiencies through more precise fertilizer application. "Precision agriculture" will have to grow if America's farmers are going to meet increasing demands for food while facing pressures to reduce their environmental footprint. .

It is the accuracy of GPS that makes the technology important to agriculture and farmers should not be expected to accept or live with a disruption in their service as a result of LightSquared's actions. Ideally, a solution or solutions will be found that allow GPS and L-band mobile broadband to co-exist, but LightSquared and GPS providers will have to work together. We feel very strongly that farmers, ranchers and GPS companies should not have to bear any additional financial burden in resolving this issue.

Until the interference issues are addressed, we urge the FCC to not allow LightSquared to operate its high-powered cellular base stations.

Thank you for your consideration.

Sincerely,

Richard Greene
Precision Agronomy Manager
MFA Incorporated